

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

LIBERTY MUTUAL FIRE	:	
INSURANCE COMPANY,	:	
	:	CIVIL ACTION
Plaintiff,	:	
	:	FILE NO.: 1:23-CV-02047-LMM
RED ROOF INNS, INC., RED	:	
ROOF FRANCHISING, LLC,	:	
RRI WEST MANAGEMENT, LLC;	:	
And FMW RRI NC, LLC,	:	
	:	
Defendants,	:	
	:	
And,	:	
	:	
JANE DOE 31, JANE DOE #2,	:	
JANE DOE #3, JANE DOE #4,	:	
W.K.; E.H.; M.M.; R.P.; M.B.;	:	
D.P.; A.F.; C.A.; R.K.; K.P.; T.H.;	:	
H.B.; and K.M.,	:	
	:	
Nominal Defendants.	:	

DEFENDANT H.B.'S JOINDER OF MOTION TO DISMISS

Defendant H.B., (“Nominal Defendant”) hereby joins in the Motion to Dismiss filed by Defendants Red Roof Inns, Inc., Red Roof Franchising, LLC, RRI West Management, LLC, and FMW RRI, LLC (the “Red Roof Defendants”), adopting the arguments raised by the Red Roof Defendants as if fully restated herein.

This 4th day of October 2024.

Respectfully submitted,

ANDERSEN, TATE, & CARR, P.C.

/s/ Donald L. Swift III

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LR 7.1 CERTIFICATE

Pursuant to L.R. 7.1D, counsel certifies that the foregoing document complies with the font and point selections approved by the Court in L.R. 5.1.C. This document was prepared using Times New Roman 14-point font.

This 4th day of October 2024.

ANDERSEN, TATE, & CARR, P.C.

/s/ Donald L. Swift III

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CERTIFICATE OF SERVICE

This is to certify that I the have served a true and correct copy of the **DEFENDANT H.B.'S JOINDER OF MOTION TO DISMISS** to the Clerk of Court for filing and uploading to the CM/ECF system, which will send notice to the counsel of record.

This 4th day of October 2024.

ANDERSEN, TATE, & CARR, P.C.

/s/ Donald L. Swift III

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